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**START**

Change Number  
M-32-96-01

Federal Facility Agreement and Consent Order  
Change Control Form

Do not use blue ink. Type or print using black ink.

Date

March 29, 1996

Originator

Phone

Dale Jackson

(509) 376-4851

Class of Change

I - Signatories

II - Executive Manager

III - Project Manager

Change Title

Revision to text of Target Action M-32-07-T05.

Description/Justification of Change

Target action M-32-07-T05 was originally established to allow the separation of radionuclides from the organic solvent waste as needed to meet transportation and acceptance criteria at a previously identified disposal facility. In the event that the radiological levels in the waste could not be reduced to meet the necessary criteria, the target action allowed for compliant interim storage outside of the B Plant canyon.

Technical difficulties have potentially impacted B Plant's ability to complete the target action on the current schedule. If efforts to decontaminate the organic solvent waste to acceptable levels for the disposal facility or for storage outside of B Plant are still required after June 1996, a milestone will be added to the B Plant deactivation milestone package to address further radionuclide separations. If a deactivation milestone is needed for separation of radionuclides from the organic solvent waste, a change control package will be submitted by June 1996 and will close out target action M-32-07-T05.

See attached sheet for continuation:

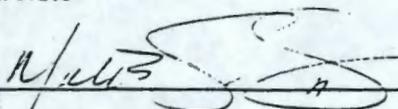
Impact of Change

This change establishes a new approach for the required separation of radionuclides from the organic solvent waste and does not impact any Tri-Party Agreement interim or major milestones.

Affected Documents

Affected Document: Hanford Federal Facility Agreement Consent Order, Appendix D, Table D.

Approvals

 3-29-96  Approved  Disapproved  
DOE Date

\_\_\_\_\_  
EPA Date  Approved  Disapproved

Laura Russell 4/2/96  Approved  Disapproved  
Ecology Date *see attached*

(Description/Justification of Change continued)

Modify target action M-32-07-T05 as follows:

M-32-07-T05 Perform operations to separate radionuclides from the organic solvent waste to support disposition of the waste to an offsite disposal facility, or compliant interim storage. June 1996

If further operations to separate radionuclides from the organic solvent waste are required after June 1996, a new milestone will be negotiated as part of the B Plant deactivation milestone package. If a new milestone for radionuclide separation of the organic is required, a change package will be submitted by June 30, 1996 and will close target action M-32-07-T05.

9613409.1951



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

April 1, 1996

Mr. Steven E. Killoy  
Westinghouse Hanford Company  
P.O. Box 1970  
Richland, WA 99352

Dear Mr. Killoy:

Re: Draft Federal Facility Agreement and Consent Order Change Control Form, Number M-32-96-01, regarding Revision to Text of Target Action M-32-07-T05.

I have reviewed the above-referenced draft change control form and do not agree with the proposed changes. Specifically, the draft requests adding language allowing target milestone M-32-07-T05 to be closed and renegotiated under B-Plant deactivation milestones if the June 1996 date cannot be met.

I do agree this transition-related milestone would appropriately fit under the upcoming B-Plant milestones. However, such negotiations should occur after June 1996 if the milestone has not been met. I realize B-Plant has struggled with treating these organic wastes to allow transportation for off-site treatment/disposal or compliant onsite interim status storage. Ecology acknowledges these efforts and shares the goal and responsibility of deactivating B-Plant using the breakthrough management approach.

If you have any questions, please contact me at (509) 736-3024.

Sincerely,

Laura Russell  
B-Area Project Manager  
Nuclear Waste Program

LR:mf

cc: Rick Gonzalez, USDOE  
Paul Krupin, USDOE  
Anna Sherwood, USDOE  
Chris Midgett, WHC  
Steve Godfrey, WHC